

FILED

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

2015 APR 13 A 10:13

REBTEL NETWORKS AB and REBTEL  
SERVICES S.À R.L.,

Plaintiffs,

v.

GLOBALROAM PTE LTD.,

Defendant.

Civil Case No.

CLERK US DISTRICT COURT

1:15cv00484-LMB/MSN

**DEMAND FOR JURY TRIAL**

**COMPLAINT FOR DECLARATORY JUDGMENT OF  
PATENT NON-INFRINGEMENT**

Plaintiffs Rebtel Networks AB and Rebtel Services S.à r.l. (collectively, “Rebtel”), by their attorneys, Ropes & Gray LLP, file this Complaint against Defendant GlobalRoam Pte Ltd. (“GlobalRoam”) and aver as follows:

**NATURE OF THE ACTION**

1. This is an action for a declaratory judgment of non-infringement of United States Patent No. 7,493,381 B2 (the “381 patent”).

**THE PARTIES**

2. Plaintiff Rebtel Networks AB is a Swedish company having its principal place of business in Stockholm, Sweden.

3. Plaintiff Rebtel Services S.à r.l. is a Luxembourg company having its principal place of business in Luxembourg, Luxembourg.

4. On information and belief, Defendant GlobalRoam Pte Ltd. is a Singapore company having its principal place of business in Ubi TechPark, Singapore.

### **JURISDICTION AND VENUE**

5. This action arises under the Declaratory Judgment Act, 28 U.S.C. §§ 2201 et seq., and under the patent laws of the United States, Title 35, United States Code. This Court has subject matter jurisdiction over this action pursuant to 35 U.S.C. §§ 271 et seq., and 28 U.S.C. §§ 1331, 1338, and 2201-2202.

6. This Court has personal jurisdiction over GlobalRoam pursuant to 35 U.S.C. § 293.

7. Venue is proper in this District pursuant to 35 U.S.C. § 293 and 28 U.S.C. §§ 1391(b) and (c).

### **CASE AND CONTROVERSY**

8. The '381 patent issued on February 17, 2009, to named inventor Hari Krishna Garg, and is entitled "*System and Method for Providing a Service.*" A copy of the '381 patent is attached hereto as Exhibit 1.

9. GlobalRoam contends that it is the present owner of the '381 Patent.

10. On February 24, 2015, GlobalRoam sent Rebtel Networks AB a letter asserting that Rebtel's international call and text services infringe the '381 patent.

11. Rebtel offers international call services in the United States, including in the Eastern District of Virginia.

### **COUNT ONE**

(Declaratory Judgment of Non-Infringement of the '381 Patent)

12. Rebtel incorporates and realleges each of the averments of paragraphs 1-11.

13. Rebtel contends that it does not infringe, either directly or indirectly, any claim of the '381 patent.

14. An actual and justiciable controversy exists between Rebtel and GlobalRoam as to whether the '381 patent is infringed by Rebtel.

15. Rebtel seeks a declaratory judgment under Rule 57 of the Federal Rules of Civil Procedure and 28 U.S.C. § 2201 that Rebtel has not infringed and is not infringing, directly or indirectly, any claim of the '381 patent and granting to Rebtel all other declaratory relief to which it may be entitled.

**PRAYER FOR RELIEF**

WHEREFORE, Rebtel prays for judgment:

A. Declaring that Rebtel has not infringed and is not infringing, directly or indirectly, any claim of United States Patent No. 7,493,381 B2;

B. Permanently enjoining GlobalRoam, its officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with it who receive actual notice by personal service or otherwise, from asserting or threatening to assert against Rebtel, and customers, potential customers, or users of Rebtel's products, any charge of infringement of United States Patent No. 7,493,381 B2;

C. Permanently enjoining GlobalRoam, its officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with it who receive actual notice by personal service or otherwise, from filing or prosecuting any civil action or actions against Rebtel's products, or users of Rebtel's products, for alleged infringement of United States Patent No. 7,493,381 B2;

D. Awarding to Rebtel its costs and attorneys' fees; and

E. Granting to Rebtel such further necessary or proper relief as the Court may deem just.

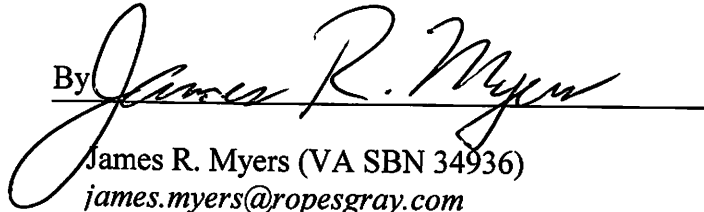
**JURY DEMAND**

Rebtel demands trial by jury on all issues eligible for submission to a jury.

Respectfully submitted,

April 13, 2015

By

A handwritten signature in black ink, reading "James R. Myers", is written over a horizontal line.

James R. Myers (VA SBN 34936)

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**REBTEL NETWORKS AB AND**

**REBTEL SERVICES S.À R.L.**